

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Renée Marie Bumb,  
District Court Judge

**[PROPOSED]  
ORDER AMENDING  
CERTAIN DEADLINES IN  
SPECIAL MASTER ORDER  
NO. 98**

**SPECIAL MASTER ORDER NO. 98A**

**THIS MATTER**, having been opened to the Court by Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (collectively, “the ZHP Defendants”) for entry of an order extending certain deadlines contained in Special Master Order No. 98 (ECF No. 2715), and for good cause shown:

**IT IS** on this \_\_\_\_ day of \_\_\_\_\_, 2024

**ORDERED** as follows:

- The ZHP Defendants’ Response to Plaintiffs’ Proposed Findings of Fact shall be due seven (7) days after Judge Bumb’s ruling on the ZHP Defendants’ objections to SMO 98, if necessary.
- The ZHP Defendants’ Response to Plaintiffs’ Proposal regarding the “monetary penalty it believes is appropriate under the circumstances”

shall also be due seven (7) days after Judge Bumb's ruling on the ZHP Defendants' objections to SMO 98, if necessary.

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Hon. Thomas I. Vanaskie (Ret.)  
Special Master